

AO 91 (Rev. 11/11) Criminal Complaint

AUSA: Matthew Roth
Special Agent: Mark JacksonTelephone: (313) 226-9186
Telephone: (313) 202-3640

UNITED STATES DISTRICT COURT

for the
Eastern District of Michigan

United States of America
v.
JEROME HILL

Case:2:18-mj-30319
Judge: Unassigned,
Filed: 06-06-2018 At 11:15 AM
USA v. JEROME HILL(CMP)(MLW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 18, 2018 in the county of Macomb in the
Eastern District of Michigan, the defendant(s) violated:

Code Section

18 U.S.C. Section 924(c)
18 U.S.C. Section 922(g)(1)
26 U.S.C. Section 5861(d)
21 U.S.C. Section 841(a)

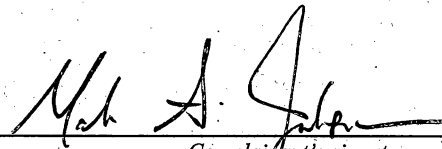
Offense Description

Possession of a Firearm in Furtherance of a Drug Trafficking Crime
Felon in Possession of Firearms
Possession of a Firearm not registered in the National Firearms Registration
Possession with Intent to Distribute Controlled Substances

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.


Complainant's signature

Mark A. Jackson, ATF Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 6/6/2018

City and state: Detroit, Michigan



Judge's signature

Anthony P. Patti, United States Magistrate Judge

Printed name and title

AFFIDAVIT

I, Mark A. Jackson, being sworn, deposes and states the following:

I. INTRODUCTION

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives, assigned to the Detroit office since 2000. Before joining the ATF, I worked as a Senior Customs Inspector with the United States Customs Service, in Detroit, for three and one-half years.

2. I am a certified law enforcement instructor. I regularly teach firearms trafficking courses both at the ATF National Academy and at advanced firearms trafficking training courses. I have participated in hundreds of investigations involving violations of federal firearms and narcotics laws. These investigations resulted in the arrest and convictions of numerous criminal defendants and the seizure of large quantities of firearms and narcotics.

3. I make this affidavit from personal knowledge based on my participation in this investigation, witness interviews, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience.

4. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all the information known to law enforcement related to this investigation.

5. I am currently investigating Jerome HILL, DOB XX/XX/73, of 2484 Chicago, Detroit, Michigan, for violations of federal firearms and narcotics laws.

II. SUMMARY OF THE INVESTIGATION

6. During the month of May in 2018, members of COMET (County of Macomb Enforcement Team), assisted by a confidential source of information, conducted two controlled buys of cocaine from HILL.

7. On May 17, 2018, law enforcement obtained a state search warrant for a residence on Chicago Street, Detroit, Michigan, Eastern District of Michigan.

8. On May 18, 2018, members of COMET and the Michigan State Police executed the state search warrant. Upon entry, the officers encountered Jerome HILL exiting the second floor bathroom. He was promptly handcuffed and secured. A search of the second floor bathroom revealed the following:

a. One blue bag that contained:

- i. Multiple plastic bags with a white powdery residue inside;
 - ii. Three digital scales; and
 - iii. Six pills that tested positive for MDMA;
- b. Small pieces of cocaine totaling 3.2 grams of cocaine next to the toilet;
 - c. Pieces of plastic bags, next to the toilet, that appeared to have been ripped open; and
 - d. Five bags of a white powdery substance totaling 91.3 gross grams in the toilet's water tank. The substance later tested positive for cocaine.

9. An inspection of the southwest bedroom revealed that it was likely the master bedroom and the bedroom used by HILL. The southwest bedroom is located directly next to the second floor bathroom where law enforcement arrested HILL. A search of this room revealed the following:

- a. Two boxes of ammunition;
- b. Banking information related to HILL;
- c. One Smith and Wesson M&P-15 rifle loaded with 28 rounds of ammunition, located in the closet; and

d. Male jackets, hats, and other male clothing also located in the closet.

10. HILL was advised of his Miranda rights. He agreed to waive his rights. Affiant asked HILL where the Glock 27, associated with the ammunition box and magazines found in the southwest bedroom, was located. HILL directed Affiant to the entranceway of the residence, immediately inside the front door. There, Affiant located a Glock 27 handgun loaded with 13 rounds inside the pocket of a man's jacket. HILL advised that the Glock 27 is there for protection.

11. The southeast bedroom contained HILL's clothes and shoes. Law enforcement found no other clothing or items attributable to anyone but HILL in that room. Officers also located a locked wall safe. In his post-Miranda statements, HILL directed officers to his key chain where the key for the gun safe was located. Officers showed the key chain to HILL's wife and asked her who the keys belonged to. She said, "those are Jerome's keys," referring to HILL. A search of this room and the safe, and other parts of the residence, revealed another eleven firearms.

12. Officers also recovered measuring devices, cutting agents, a blender, a drug press and residency documents for HILL.

13. One of the firearms seized is a Sten MKV bearing serial number 163560, known to be a fully automatic machinegun, regulated by the National Firearms Act. A check of this firearm revealed that the firearm was not registered to HILL, as required by law.

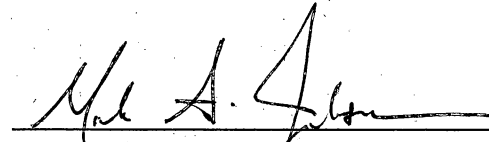
14. On May 18, 2018, Affiant queried the National Crime Information Center (NCIC) for Jerome HILL (B/M, DOB XX/XX/73). NCIC revealed that HILL pled guilty in 2008 to felony controlled substance-delivery/manufacture, a felony punishable by more than one year.

15. On May 25, 2018, Special Agent David Salazar, an Interstate Nexus Expert, reviewed the information on the thirteen firearms seized from HILL's residence. Salazar reported that his preliminary examination indicates that the majority of these firearms were manufactured outside the State of Michigan, thus had traveled in interstate commerce.

III. CONCLUSION

16. Probable cause exists that Jerome HILL, DOB XX/XX/73, a convicted felon, did knowingly and intentionally possess a firearm in relation to a federal drug trafficking crime (18 U.S.C. § 924(c)); was a felon in possession of a firearm (18 U.S.C. § 922(g)(1)); possessed with intent to

distribute a controlled substance (21 U.S.C. § 841(a)); and unlawfully possessed a NFA firearm (26 U.S.C. § 5861(d)).


Mark A. Jackson
ATF Special Agent

Sworn and subscribed to before
me on this 6th day of June, 2018.


HONORABLE ANTHONY P. PATTI
UNITED STATES MAGISTRATE JUDGE